## Shapiro Croland Shapiro, Croland, Reiser, Apfel & Di Iorio, LLP

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July 21, 2020

## VIA FEDERAL EXPRESS

Dore LaPosta, Director
Enforcement and Compliance Assurance Division
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

Re: Request for Information Pursuant to Section 114 of the Clean Air Act Reference No. CAA-02-2020-1461

Dear Ms. La Posta:

We represent Parkway Iron & Metal Inc. in connection with the Request for Information referenced above, dated June 9, 2020.

The Request for Information was addressed to Jason Putzer, Manager. Mr. Putzer has been furloughed from the company and on leave because of the COVID-19 pandemic since March of this year. Your office's cover letter indicates that the Request for Information is to be submitted to your office within the thirty (30) day timeline specified in Part III of Enclosure I, which provides that such responses are to be submitted no later than thirty (30) days after receipt of the request. This matter was brought to our attention by the company after it was discovered that the letter to Mr. Putzer was not opened until several days after its receipt at the company's offices in Clifton, New Jersey. The date of actual receipt is not known.

As you can expect, staff reductions by the client and other conditions brought about by the COVID-19 pandemic have interfered with client's ability to attend to the responses within the time permitted. Given that we have only recently been engaged to assist the company in preparing the responses to the Request for Information, we are respectfully requesting an extension of time for Parkway Iron & Metal Inc. to provide responses to the Request for Information, through August 31, 2020. You have our assurance that we are attending to assisting

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the client in preparing responses to the Request for Information and that such responses will be provided as soon as they are available.

We would appreciate hearing from you with regard to this request. In the meantime, we thank you for your courtesy and attention to this matter.

Very truly yours,

Alexander G. Benisatto

AGB:ek

cc: Robert Buettner, Chief (Air Compliance Branch)

Stuart Reiser, Esq.